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9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 JESSIKAH KIPF,

12 Plaintiff,

13 vs.

14 I.Q. DATA INTERNATIONAL, INC.;
EXPERIAN INFORMATION
15 SOLUTIONS, INC.; TRANS UNION,
LLC; EQUIFAX INFORMATION
16 SERVICES, LLC,

17 Defendants.

Case No.: 2:24-cv-00165-JAD-BNW

**Joint Proposed Discovery Plan and
Scheduling Order Submitted In
Compliance With LR 26-1(b)**

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20 Plaintiff JESSIKAH KIPF (“Plaintiff”) and Defendants I.Q. DATA
21 INTERNATIONAL, INC, (“IQ Data”), EXPERIAN INFORMATION SOLUTIONS,
22 INC. (“Experian”), and EQUIFAX INFORMATION SERVICES, LLC (“Equifax”)
23 (jointly all as the “Parties”),¹ by and through their respective counsel, hereby submit
24 this proposed Joint Discovery Plan and Scheduling Order.

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28 ¹ Defendant Trans Union LLC does not join in this motion because it has settled its claims with Plaintiff.

The Parties propose the following discovery plan and scheduling order:

PROPOSED DISCOVERY PLAN

1. **Discovery Cut-Off Date:** Defendant IQ Data filed its Answer to the First Amended Complaint on June 20, 2024 (ECF No. 15), Defendant Equifax filed its Answer to the First Amended Complaint on July 5, 2024 (ECF No. 17), while Defendant Experian filed its Answer to the First Amended Complaint on July 5, 2024. ECF No. 19. To allow for all discovery to take place, the proposed cut-off date for discovery shall be **December 17, 2024**, 180 days from the date of Defendant's Answer.

2. **Amending the Pleadings and Adding Parties:** All motions to amend the pleadings or to add parties shall be filed no later than **September 18, 2024**, 90 days prior to the proposed close of discovery.

3. **Fed.R.Civ.P. 26(a)(2) Disclosures (Experts):** Disclosures and reports concerning experts shall be made by **October 18, 2024**, 60 days before the proposed discovery cut-off date. Disclosures and reports concerning rebuttal experts shall be made by **November 18, 2024**, 30 days after the initial disclosure of experts.

4. **Dispositive Motions:** The date for filing dispositive motions shall not be later than **January 16, 2025**, 30 days after the proposed close of discovery. In the event that the discovery period is extended from the discovery cut-off date set forth in this proposed Discovery Plan and Scheduling Order, the date for filing dispositive motions shall be extended to be not later than 30 days from the subsequent discovery cut-off date.

5. **Pretrial Order:** The date for filing the joint pretrial order shall not be later than **February 17, 2025**, 30 days after the cut-off date for filing dispositive motions. In the event that dispositive motions are filed, the date for filing the joint pretrial order shall be suspended until 30 days after decision on the dispositive motions or until further order of the court. In the further event that the discovery period is extended from the discovery cut-off date set forth in this Discovery Plan and

1 Scheduling Order, the date for filing the joint pretrial order shall be extended in
2 accordance with the time periods set forth in this paragraph.

3 6. **Pretrial Disclosures**: The disclosures required by Fed. R. Civ. P.
4 26(a)(3), and any objections thereto, shall be included in the joint pretrial order.

5 7. **Extensions or Modifications of the Discovery Plan and Scheduling**
6 **Order**: Applications to extend any date set by the discovery plan, scheduling order,
7 or other order must comply with the Local Rules.

8 8. **Initial Disclosures**: The Parties shall make initial disclosures on or
9 before **August 5, 2024**, to the extent that initial disclosures have not yet been made.

10 9. **Protective Order**: The Parties may seek to enter a stipulated protective
11 order pursuant to Rule 26(c) prior to producing any confidential documents.

12 10. **Electronic Service**: The Parties agree that electronic service of
13 discovery documents may be used.

14 11. **Alternative Dispute Resolution Certification**: The Parties certify that
15 they met and conferred about the possibility of using alternative dispute-resolution
16 processes including mediation, arbitration, and early neutral evaluation.

17 The Parties are generally agreeable to the Alternative Dispute Resolution
18 through, including but not limited to, mediation and early neutral evaluation after an
19 initial period of discovery.

20 12. **Alternative Forms of Case Disposition Certification**: The Parties
21 certify that they considered consent to trial by a magistrate judge under 28 U.S.C. §
22 636(c) and Fed. R. Civ. P. 73 and the use of the Short Trial Program (General Order
23 2013-01). The parties have not reached any stipulations at this stage.

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13. **Electronic Evidence**: The Parties certify that they discussed the possibility of producing documents in electronic format, which could then facilitate presenting electronic evidence to jurors for the purposes of jury deliberations at trial. The parties have not reached any stipulations at this stage.

DATED this 5th day of August 2024.

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SCHEDULING ORDER

The above-set stipulated Discovery Plan of the Parties shall be the Scheduling Order for this action pursuant to Federal Rule of Civil Procedure 16(b) and Local Rule 16-1.

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: 8/6/2024

CERTIFICATE OF SERVICE

I HEREBY CERTIFY pursuant to Rule 5 of the Federal Rules of Civil Procedure that on August 5, 2024, the foregoing JOINT PROPOSED DISCOVERY PLAN AND SCHEDULING ORDER was served via CM/ECF to all parties appearing in this case.

Respectfully submitted,

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